

1 Michael Kind, Esq.
2 Nevada Bar No. 13903
3 **KAZEROUNI LAW GROUP, APC**
4 6069 South Fort Apache Road, Suite 100
5 Las Vegas, NV 89148
6 Phone: (800) 400-6808 x7
7 mkind@kazlg.com

8 David H. Krieger, Esq.
9 Nevada Bar No. 9086
10 **HAINES & KRIEGER, LLC**
11 8985 S. Eastern Avenue, Suite 350
12 Henderson, NV 89123
13 Phone: (702) 880-5554
14 dkrieger@hainesandkrieger.com
15 *Attorneys for Plaintiff Jill D. Parks*

16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

<p>Jill D. Parks, v. Bank of America, N.A., et al, Defendants.</p>	<p>Case No.: 2:18-cv-00712-KJD-NJK Stipulation for an extension of time for Plaintiff to Respond to Defendant's Motion to Dismiss [ECF No. 8] (Second Request)</p>
--	--

Plaintiff Jill D. Parks (“Plaintiff”) and Bank of America, N.A. (“Defendant”), by and through their respective counsel, hereby submit this stipulation for an extension of time—until **July 30, 2018**—for Plaintiff to respond to Defendant’s Motion to Dismiss Plaintiff’s Complaint, filed on June 11, 2018, ECF No. 8. Plaintiff’s Response is currently due on July 16, 2018. *Id.*

1 In good faith and not for the purposes of delay, Plaintiff has requested and
2 Defendant has agreed to allow Plaintiff an additional 14 days to respond to the
3 Motion.

4 Plaintiff requested the extension to allow additional time for the parties to
5 discuss resolution, since settlement discussions are still ongoing. Plaintiff is also
6 considering requesting leave to amend the Complaint instead of opposing
7 Defendant's motion. The Parties in good faith stipulate to allow additional time for
8 Plaintiff to respond to the Motion. This is the second request for an extension of this
9 deadline.

10 The Parties therefore stipulate that Plaintiff's response to Defendant's motion
11 to dismiss, ECF. No. 8, shall be due on or before **July 30, 2018**.

12 DATED this 13th day of July 2018.

13 **KAZEROUNI LAW GROUP, APC**

14 By: /s/ Michael Kind
15 Michael Kind, Esq.
16 6069 South Fort Apache Road, Suite 100
17 Las Vegas, Nevada 89148
18 *Attorneys for Plaintiff*

19 **Akerman LLP**

20 By: /s/ Rex Garner
21 Rex Garner, Esq.
22 1635 Village Center Circle, Suite 200
23 Las Vegas, NV 89134
24 *Attorneys for Defendant*

25 IT IS SO ORDERED:

26 
27 UNITED STATES MAGISTRATE JUDGE

28 DATED: July 18, 2018